

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

-----  
THIS DOCUMENT RELATES TO:

*Simmons v. C.R. Bard Inc., et. al.*, 2:18-cv-00404-DGC

No. 2:15-cv-02641-DGC

MDL No: 2641

**STIPULATION OF DISMISSAL OF PLAINTIFF JOHN PATRICK SIMMONS'S  
CLAIMS WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), that Plaintiff John Patrick Simmons's claims in the above-captioned matter be dismissed with prejudice, each party to bear its own costs. This Stipulation dismisses all of Mr. Simmons's claims against all parties in the above-captioned action, including those parties who have not entered their appearance and/or signed the stipulation.

/s/ Matthew R. McCarley

Matthew R. McCarley  
State Bar No. 24041426

Fears | Nachawati Law Firm  
4925 Greenville Avenue  
Suite 715  
Dallas, Texas 75206  
T. (214) 890.0711  
F. (214) 890.0712  
mccarley@fnlawfirm.com

**ATTORNEY FOR PLAINTIFF  
JOHN PATRICK SIMMONS**

/s/ Richard B. North, Jr.

Richard B. North, Jr.  
State Bar No. 545599  
Matthew B. Lerner  
State Bar No. 446986

Nelson Mullins Riley & Scarborough LLP  
Atlantic Station  
201 17th Street, NW  
Suite 1700  
Atlanta, Georgia 30363  
T. (404) 322.6000  
F. (404) 322.6397  
[richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com)

**ATTORNEYS FOR C.R. BARD, INC. AND  
BARD PERIPHERAL VASCULAR, INC.**